EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VERSUS TECHNOLOGY, INC., Plaintiff,	)	
v.	)	Civil Action No. 04-1231 (SLR)
RADIANSE, INC. Defendant.	)	

RADIANSE, INC.'S SUPPLEMENTAL ANSWERS TO VERSUS' FIRST SET OF INTERROGATORIES

The defendant, Radianse, Inc. ("Radianse"), hereby supplements its answers to Versus' First Set of Interrogatories (Nos. 1-3).

INTERROGATORY NO. 1

Describe in detail and provide a claim chart showing the complete factual and legal bases for Radianse's contention that the patents-in-suit are invalid, including, but not limited to, the identification of each document which relates, reflects or refers to the factual and legal bases for any such contention by Radianse, and the identification of the individual(s) most knowledgeable concerning the bases for any such contention.

SUPPLEMENTAL ANSWER NO. 1

The following charts set forth additional factual and legal bases for Radianse's contention that the patents-in-suit are invalid.

USP 5,027,314	**USP 5,150,310 (GREENSPUN)**
CLM 1. A system for tracking a number of subjects in a plurality of areas comprising:	Abstract; Col. 1, ln. 6-11; Col. 5, 1-15.
a plurality of transmitters, wherein at least one transmitter is associated with each of said	Col. 5, ln 20-21, 26-31; Col. 6, ln. 55-59

subjects, each of said transmitters comprising transmission means for transmitting a light based signal representative of an identifying code unique to that transmitter;	
a plurality of receivers, wherein at least one of said receivers is associated with each of said areas, each of said receivers comprising a converter for converting a transmitted light based signal to an electrical signal and a validation circuit for processing said electrical signal to determine whether said electrical signals are representative of the unique identifying codes associated with said transmitters; and	Col. 5, ln. 6-10, 32-55; Col. 6, ln. 40-44; Col. 8, ln. 59-66
processor means, connected to each of said receivers, for recording those electrical signals which are representative of said unique identifying codes, for recording the receiver which determined that such electrical signals are representative of the unique identifying codes associated with said transmitters and for determining in which of said areas said transmitters are located,	Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54

wherein said processor means comprises scanning means for scanning said receivers and accumulating means for accumulating with respect to each transmitter those areas in which receivers have determined that an electrical signal is representative of the unique identifying code associated with that particular transmitter and for accumulating a badge count for each accumulated area, said badge count being representative of the number of times a receiver has determined that an electrical signal is representative of the unique identifying code associated with that particular transmitter.	Col. 9, ln. 45-61; Col. 11, ln. 35-45
CLM 9. A method for tracking a number of subjects in a plurality of areas in a system wherein at least one transmitter is associated with each of said subjects, each transmitter being capable of transmitting a light based signal representative of an identifying code unique to that transmitter, comprising the steps of:	Abstract; Col. 1, ln. 6-11; Col. 5, 1-15; Col. 5, ln 20-21, 26-31; Col. 6, ln. 55-59
converting, in a receiver, the transmitted light based signal to an electrical signal and validating said electrical signal to determine whether said electrical signal is representative of the unique identifying codes associated with said transmitter;	Col. 5, ln. 6-10, 32-55; Col. 6, ln. 40-44; Col. 8, ln. 59-66
recording those electrical signals which are representative of said unique identifying codes;	Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54
recording the receiver which determined that such electrical signals are representative of the unique identifying codes associated with said transmitters; and	Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54

determining in which of said areas said transmitters are located, wherein the recording the receiver and the determining steps comprise the steps of scanning said receivers and accumulating with respect to each transmitter those areas in which receivers have determined that an electrical signal is representative of the unique identifying code associated with a particular transmitter and accumulating a badge count for each accumulated area, said badge count being representative of the number of times a receiver has determined that an electrical signal is representative of the unique identifying code associated with the particular transmitter.	Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54; Col. 9, ln. 45-61; Col. 11, ln. 35-45

USP 5,572,195	USP 5,150,310 (GREENSPUN)	USP 5,402,469 (HOPPER)	USP. 5,426,425 (CONRAD)	USP 5,455,851 (CHACO)
CLM 1. An object location and tracking system for tracking infrared transmitters that transmit identifying codes, comprising:	Abstract; Col. 1, ln. 6-11; Col. 5, 1-15, 20-21, 26-31	Abstract; Col. 2, ln 54-56	Abstract; Col. 2, ln 40-53; Col. 3, ln 27-55; Col. 5, ln 25-28; Col. 8, ln 25-Col. 9,ln 8	Abstract; Col. 2, ln 5-19
a computer network for passing messages;	Col. 8, ln. 5-12	Col. 4, ln 50-53	Col. 4, ln 60-Col. 5, ln4; Col. 11, ln 1-15; Col. 13, ln 1-35	Col. 2, ln 39-45; Col. 3, ln 48-Col. 4, ln 27
a computer connected to said network, said computer including means for sending and receiving messages over said computer network in a variable-based protocol that implements object identifier variables;	Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54 Col. 5, ln. 32-40; Col. 7, ln 3-7, 33-48 Col. 8, line 5-12; Col 10, ln 30-39	Col. 4; ln 55; Col. 5, ln 19-Col 6, ln 30	Col. 3, ln 7-9; Col. 4, ln 55-60	Col. 2, ln 26-30; Col. 3, ln 29-47
a plurality of infrared sensors for receiving transmitted identifying codes from the infrared transmitters, said plurality of infrared sensors providing signals containing the transmitted identifying codes; and	Col. 5, ln. 6-10, 32-55; Col. 6, ln. 40-44; Col. 8, ln. 59-66	Col. 4, ln 65-Col 5, ln 4	Col 2, ln 55-62; Col. 5, ln 28-34; Col 9, ln 10-Col. 10, ln 65	Col. 2, ln 22-26; Col. 7, ln 61-Col. 8, ln 10
interface circuitry coupling said plurality of infrared sensors to said computer network, said interface circuitry including means for providing to said computer network object identifier variables in the variable-based protocol corresponding to the transmitted identifying codes received from said signals from said plurality of infrared sensors.	Col. 7, ln 3-10	Col. 2, ln 65-70; Col 5, ln 6-19	Col. 5, ln 5-24; Col. 11, ln 18-Col. 12, ln 50	Col. 8, ln 10-17; Col. 8, ln 54-Col. 9, ln 36

CLM 13. A method for tracking and locating objects in a system with a computer network, a computer connected to the computer network, infrared sensors, and interface circuitry connecting the computer network to the infrared sensors, the infrared sensors being adapted to receive unique identifying codes from infrared transmitters, comprising the steps of:	Abstract; Col. 1, ln. 6-11; Col. 5, 1-15, 20-21, 26-31; Col. 8, ln. 5-12; Col. 5, ln. 10-15, 50-55; Col. 6, ln. 40-54; Col. 8, ln. 36-54; Col. 5, ln. 32-40; Col. 7, ln 3-7, 33-48; Col. 8, line 5-12; Col 10, ln 30-39; Col. 5, ln. 6-10, 32-55; Col. 6, ln. 40-44; Col. 8, ln. 59-66 Col. 7, ln 3-10	Abstract; Col. 2, ln 54-56 Col. 4, ln 50-53; Col. 4; ln 55; Col. 5, ln 19-Col 6, ln 30; Col. 4, ln 65-Col 5, ln4; Col. 2, ln 65-70; Col 5, ln 6-19	Abstract; Col. 2, ln 40-53; Col. 3, ln 27-55; Col. 5, ln 25-28; Col. 8, ln 25-Col. 9,ln 8; Col. 4, ln 60-Col. 5, ln4; Col. 11, ln 1-15; Col. 13, ln 1-35; Col. 3, ln 7-9; Col. 4, ln 55-60; Col 2, ln 55-62; Col. 5, ln 28-34; Col 9, ln 10-Col. 10, ln 65; Col. 5, ln 5-24; Col. 11, ln 18-Col. 12, ln 50	Abstract; Col. 2, ln 5-19; Col. 2, ln 39-45; Col. 3, ln 48-Col. 4, ln 27; Col. 2, ln 26-30; Col. 3, ln 29-47; Col. 2, ln 22-26; Col. 7, ln 61-Col. 8, ln 10; Col. 8, ln 10-17; Col. 8, ln 54-Col. 9, ln 36
providing object identifier variables in the interface circuitry, said object identifier variables adapted for being communicated over the computer network in a variable based protocol;	Col. 8, ln 27-35	Col. 5, ln 5-19	Col. 3, ln 7-9; Col. 4, ln 55-60; Col. 5, ln 35-45	Col. 8, ln 54-Col. 9, ln 16
receiving in one of the infrared sensors a transmission from one of the infrared transmitters containing a unique identifying code;	Col. 7, ln 11-Col. 8, ln 8	Col. 4, ln 65-Col. 5, ln 4	Col. 2, ln 55-62; Col. 5, ln 28-34; Col. 9, ln 10-Col. 10, ln 65	Col. 8, ln 19-52
sending the received unique identifying code from the infrared sensor to the interface circuitry;	Col. 7, ln 3-10	Col. 5, ln 14-18	Col. 5 ln 5-24	Col. 8, ln 10-17
providing the unique identifying code in the interface circuitry to the computer network in association with an object identifier variable; and	Col. 8, ln 9-12	Col. 5, ln 5-27	Col. 5 ln 5-24; Col. 11, ln 18-Col. 12, ln 50	Col. 8, ln 10-17; Col. 8, ln 54-Col. 9, ln 16
receiving in the computer the unique identifying code from the network by accessing its associated object identifier variable.	Col. 8, ln 9-35	Col. 5, ln 19-59	Col. 5, ln 35-45	Col. 9, ln 16-36

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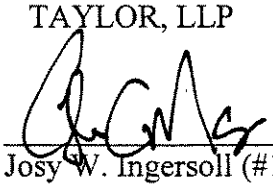


Josy W. Ingersoll (#1088)
John W. Shaw (#3362)
Glenn C. Mandalas (#4432)
gmandalas@ycst.com
The Brandywine Building
1000 West Street, 17th Floor
P. O. Box 391
Wilmington, Delaware 19899-0391
(302) 571-6672

Of Counsel:

Sibley P. Reppert
William A. Scofield, Jr.
LAHIVE & COCKFIELD
28 State Street
Boston, MA 02109-1784
(617) 227-7400

Attorneys for Radianse, Inc.

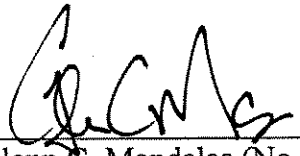
Dated: August 9, 2005

CERTIFICATE OF SERVICE

I, Glenn C. Mandalas, Esquire, hereby certify that on August 9, 2005, I caused the foregoing document to be served by hand delivery on the following counsel of record:

George Pazuniak , Esquire
Connolly Bove Lodge & Hutz LLP
The Nemours Building
1007 North Orange Street
PO Box 2207
Wilmington, DE 19899

YOUNG CONAWAY STARGATT
& TAYLOR, LLP



Glenn C. Mandalas (No. 4432)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
gmandalas@ycst.com

Attorneys for Radianse, Inc.